

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Ad Hoc Committee of Supporting Counsel (the “**AHC of Supporting Counsel**”), by and through its counsel, having filed substantially contemporaneously with this Application (i) the *Omnibus Response of Ad Hoc Committee of Supporting Counsel to Replies in Support of Motions to Dismiss* (the “**Response**”), and (ii) the *Motion of the Ad Hoc Committee of Supporting Counsel to File Under Seal and Redact Certain Information in Response of Ad Hoc Committee of Supporting Counsel to Replies in Support of Motion to Dismiss* (the “**Motion**”), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Scheduling Order**”), for the reasons set forth below:

1. **For the reasons set forth below, the AHC of Supporting Counsel respectfully requests that the hearing on the Motion be scheduled for June 27, 2023, at 9:00 a.m.,** or as soon thereafter as the Court’s calendar permits.

2. As set forth in the Motion, the AHC of Supporting Counsel seeks to file under seal the redacted portions of the Response in opposition to the eleven motions to dismiss filed in the Debtor’s chapter 11 case (the “Motions to Dismiss”). The materials sought to be sealed have been designated by one or more of the Debtor, the Official Committee of Talc Claimants (the “TCC”), and the AHC of Supporting Counsel as confidential and constitute “Confidential Information” as that term is defined in that certain *Order Governing Confidential Information By and Between the Official Committee of Talc Claimants and the Debtor Pursuant to D.N.J. LBR 9021-1(b)* [Docket No. 545] (the “Confidentiality Order”).

3. Trial on the Motions to Dismiss is scheduled to begin on June 27, 2023 at 9:00 a.m. The deadline for the AHC of Supporting Counsel to file the Response is June 26, 2023. Under

this schedule, the AHC of Supporting Counsel is unable to provide the full notice otherwise required regarding the Motion.

4. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

Dated: June 26, 2023

COLE SCHOTZ P.C.

/s/ Michael D. Sirota

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